

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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CHERYL COX,

Plaintiff,

- against -

CITY OF ROCHESTER,  
DAKOTA VANBREDERODE

Defendants.

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**DECLARATION OF  
PEACHIE L. JONES, ESQ.**

Case no: 22-cv-6207 (FPG)(MJP)

Peachie L. Jones, Esq., declares and says:

1. I am a Municipal Attorney for the City of Rochester, admitted to practice law before this court, and represent the City of Rochester and Dakota Vanbrederode in this action.

2. I submit this Declaration in support of Defendants' Bill of Costs and as an itemization of those costs.

3. The information set forth herein is based upon my personal knowledge and a review of the proceedings in this action.

4. Defendants served a subpoena on the Regional Transit Service ("RTS"), which cost \$65.00 to serve. A copy of the invoice for the service of the RTS subpoena is enclosed as **Exhibit A**.

5. Seven depositions were conducted in this matter, with the following costs:

- Connor Brock ..... \$392.20
- Benjamin Caruso ..... \$652.85
- Cheryl Cox ..... \$835.10
- James Crosby ..... \$371.87 [½ of \$743.75]
- Ethan Paszko ..... \$587.45
- Kenneth Pinckney ..... \$475.27
- Dakota Vanbrederode ..... \$983.35

6. The parties agreed that Defendants would depose Plaintiff's proposed expert James Crosby for both the *Cox* (22-cv-6207-FPG-MJP) and *Dempsey* (19-cv-6780-EAW-CDH) cases on June 12, 2024. As such, Defendants have attributed half of the cost of the deposition transcript and Mr. Crosby's fee to this matter.

7. Copies of the invoices for these seven deposition transcripts are enclosed as **Exhibit B**.

8. A copy of the invoice from James Crosby for his depositions is enclosed as **Exhibit C**. The *Cox-Dempsey* deposition was held June 12. Consistent with the explanation in paragraph 6, only one-half of that fee is attributed to this case. (One-half of one thousand dollars is five hundred dollars.)

Dated: February 7, 2025

  
PEACHIE L. JONES, ESQ.